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Attorneys for WAYMO LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.;  
OTTOMOTTO LLC; OTTO TRUCKING  
LLC,

Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE  
CORREDOR IN SUPPORT OF  
DEFENDANT OTTO TRUCKING LLC'S  
ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL**

the

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to  
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,  
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set  
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendant Otto Trucking’s Administrative Motion  
7 to File Under Seal (the “Administrative Motion”). The Administrative Motion seeks an order sealing  
8 highlighted portions of Otto Trucking’s Response to Waymo’s Supplemental Opposition to Otto  
9 Trucking’s Motion for Separate Trial (“Otto Trucking’s Response”) and Exhibits 1-2, 4, and 6 to the  
10 Brun Declaration, as well as the entirety of Exhibits 3 and 5 thereto.

11 3. The portions of Exhibits 1-2, 4, and 6 identified below contain or refer to trade secrets  
12 and confidential business information, which Waymo seeks to seal.

13 4. Exhibit 1 (portions marked in red boxes), Exhibit 2 (portions highlighted in green and  
14 blue), Exhibit 4 (portions marked in red boxes in version previously filed at Dkt. 1470-2), and Exhibit  
15 6 (portions highlighted in green) contain, reference, and/or describe Waymo’s asserted trade secrets,  
16 including as misappropriated by Defendants. The information Waymo seeks to seal includes the  
17 confidential design and functionality of Waymo’s proprietary autonomous vehicle system, including  
18 its source code and LiDAR designs, which Waymo maintains as secret. I understand that these trade  
19 secrets are maintained as secret by Waymo (Dkt. 25-47) and that the trade secrets are valuable to  
20 Waymo’s business (Dkt. 25-31). The public disclosure of this information would give Waymo’s  
21 competitors access to descriptions of the functionality or features of Waymo’s autonomous vehicle  
22 system. If such information were made public, I understand that Waymo’s competitive standing  
23 would be significantly harmed.

24 5. Exhibit 1 (portions marked in red boxes) additionally contains, references, and/or  
25 describes Waymo’s highly confidential and sensitive business information. The information Waymo  
26 seeks to seal regards confidential details regarding Waymo’s business, including details about  
27 potential partnerships and product release details. I understand that this confidential business  
28 information is maintained by Waymo as secret. The public disclosure of this information would give

Waymo's competitors access to Waymo's business strategy for its autonomous vehicle system. If such information were made public, I understand that Waymo's competitive standing would be significantly harmed.

6. In addition, Waymo understands that Exhibits 4 and 6 (portions highlighted in yellow) are considered confidential trade secrets by third party Velodyne. (*See* Dkt. 1455 (Velodyne declaration supporting sealing of Exhibit 4 as previously filed at Dkt. 1419); Dkt. 1740 (Velodyne declaration supporting sealing of Exhibit 6 as previously filed at Dkt. 1636).) In the event the Court were to deny Velodyne's request to keep its confidential information under seal, Waymo may support sealing additional portions of Exhibits 4 and 6.

7. Waymo's request to seal is narrowly tailored to those portions of Exhibits 1-2, 4, and 6 that merit sealing.

I declare under penalty of perjury under the laws of the State of California and the United States of America that the foregoing is true and correct, and that this declaration was executed in San Francisco, California, on October 30, 2017.

By /s/ Felipe Corredor

Felipe Corredor  
Attorneys for WAYMO LLC

### **ATTESTATION**

In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from Felipe Corredor.

By: /s/ Charles K. Verhoeven  
Charles K. Verhoeven